

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**PLAINTIFFS' MOTION FOR INTERIM MODIFICATIONS TO THE DISCOVERY
PLAN DUE TO GOOGLE'S NON-COMPLIANCE WITH DISCOVERY DEADLINES**

Pursuant to Federal Rule of Civil Procedure 37, and Local Rules 16(B) and 37, Plaintiffs, through their undersigned counsel, hereby respectfully submit this motion for interim modifications to the discovery plan to mitigate, in part, the prejudice to Plaintiffs arising from Google's failure to produce hundreds of thousands—and possibly millions—of documents by the deadlines imposed by this Court. Because the full extent of Google's non-compliance is still unknown, through no fault of Plaintiffs, this motion seeks only preliminary relief, given the scheduled close of fact discovery today. ECF Nos. 69 and 94. As additional information is made available by Google, Plaintiffs may need to seek supplemental relief.

Dated: September 8, 2023

Respectfully submitted,

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